

REMARKS

Claims 1-24 are all the claims pending in this application. Reconsideration and allowance of all the rejected claims are respectfully requested in view of the following remarks.

REJECTION UNDER 35 U.S.C. §102(e)

Claims 1-24 remain rejected under 35 U.S.C. §102(e) as being anticipated by Traversat et al. (U.S. Patent No. 6,052,720). Applicants respectfully traverse this rejection on the following basis.

In the “Response to Arguments” section, the Examiner acknowledges that he “agrees with the Applicants in that an application configuration, in and of itself, is not a device image” (see page 2 of the April 7, 2004 final office action). Nonetheless, the Examiner maintains his position that Traversat et al. may be interpreted in such a way that the “application configuration compose a device image” (see page 2 of the April 7, 2004 final office action).

Independent claims 1 and 13 recite the feature of customizing the at least one image to form at least one customized image, among other things. In an exemplary embodiment, application objects may be created for new applications and then the application object image may be associated with a base image of a workstation (see the specification at page 14, lines 8-10). As a result, a base image may remain constant while associated applications may be updated to dynamically change the image (see the specification at page 14, lines 12-14).

Based on the Examiner's stated analogy of interpreting Traversat et al.'s application configuration to compose a device image, the result of the Examiner's interpretation would be to customize (i.e., change) the application configuration when application changes, upgrades, and new applications are introduced. This appears to be in conflict with the teaching of Traversat et al., which discloses that "any software updates, version upgrades, or installation of new applications that require knowledge of and access to a subsystem configuration can be implemented from the central repository" (see Traversat et al., col. 6, lines 23-26). In particular, there is no teaching in Traversat et al. for customizing the application configurations. Rather, Traversat et al. discloses storing the configuration information in a central repository so that it may be accessed (but not customized) by any software updates, version upgrades, or installation of new applications that require knowledge of the configuration information. In fact, customizing *application configuration*, as suggested by the Examiner's interpretation, would frustrate the intent of Traversat et al. to adapt new applications to existing user specified application configurations. Thus, there appears to be no support in Traversat et al. for the Examiner's alleged "broadest, most *reasonable interpretation* of a device image" to include application configurations (emphasis added, see page 2 of the April 7, 2004 final office action).

Since Traversat et al. neither discloses nor suggests the invention claimed in independent claim 1 and its dependent claims 2-12 or the invention claimed in independent claim 13 and its dependent claims 14-24, these claims clearly are not

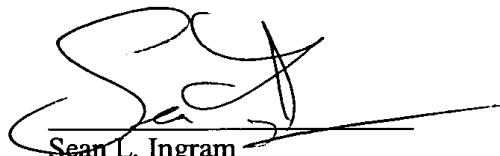
Application Serial No.: 09/766,407
Attorney Docket No.: 23415-007
Customer Number: 29315
Response Under 37 C.F.R. §1.116

anticipated by Traversat et al.'s disclosure. For the foregoing reasons, reconsideration and allowance of these claims are requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Dated: July 7, 2004

Respectfully submitted,



Sean L. Ingram

Registration No.: 48,283

MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND
POPEO, P.C.

12010 Sunset Hills Road, Suite 900
Reston, Virginia 20190
703-464-8140

Customer No. 29315

RES 117547v1